

Objection Deadline: June 30, 2008 at 4:00 p.m.

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- and -

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11
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DELPHI CORPORATION, <u>et al.</u> ,	:	Case No. 05-44481 (RDD)
	:	
Debtors.	:	(Jointly Administered)
	:	
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NOTICE OF PRESENTMENT OF JOINT STIPULATION AND AGREED
ORDER COMPROMISING AND ALLOWING PROOFS OF CLAIM
NUMBERS 1933, 2708, 2709, 2710, 2711, AND 2712
(LIQUIDITY SOLUTIONS INC., AS ASSIGNEE OF METAL POWDER
PRODUCTS CO. AND EST TESTING SOLUTIONS)

PLEASE TAKE NOTICE that on June 15, 2007, Delphi Corporation and certain of its subsidiaries and affiliates, debtors and debtors-in-possession in the above-captioned cases (collectively, the "Debtors"), objected to proofs of claim number 2708, 2709, 2711, and 2712 filed by Metal Powder Products Company ("MPP") and proof of claim number 1933 filed by EST Testing Solutions ("EST") and assigned to Liquidity Solutions, Inc. (the "Claimant") pursuant to the Debtors' Seventeenth Omnibus Objection (Substantive) Pursuant To 11 U.S.C. Section 502(B) And Fed. R. Bankr. P. 3007 To Certain (A) Insufficiently Documented Claims, (B) Claims Not Reflected On Debtors' Books And Records, (C) Insurance Claim Not Reflected On Debtors' Books And Records, (D) Untimely Claims And Untimely Tax Claims, And (E) Claims Subject To Modification, Tax Claims Subject To Modification, And Modified Claims Asserting Reclamation (Docket No. 8270) (the "Seventeenth Omnibus Claims Objection").

PLEASE TAKE FURTHER NOTICE that on July 13, 2007, the Debtors objected to proof of claim number 2170 (together with proofs of claim number 1933, 2708, 2709, 2711, and 2712, the "Proofs of Claim") filed by MPP and assigned to the Claimant pursuant to the Debtors' Nineteenth Omnibus Objection (Substantive) Pursuant To 11 U.S.C. Section 502(b) And Fed. R. Bankr. P. 3007 To Certain (A) Insufficiently Documented Claims, (B) Claims Not Reflected On Debtors' Books And Records, (C) Untimely Claim, And (D) Claims Subject To Modification, Tax Claims Subject To Modification, Modified Claims Asserting Reclamation, And Consensually Modified And Reduced Claims (Docket No. 8617) (the "Nineteenth Omnibus Claims Objection," and together with the Seventeenth Omnibus Claims Objection, the "Omnibus Claims Objections").

PLEASE TAKE FURTHER NOTICE that the Debtors and the Claimant have agreed to settle the Omnibus Claims Objections with respect to the Proofs of Claim, and because

the claims (separately "Claim 1933," "Claim 2708," "Claim 2709," "Claim 2710," "Claim 2711," and "Claim 2712," and together the "Claims") asserted in the Proofs of Claim involve ordinary course controversies and pursuant to the Amended And Restated Order Under 11 U.S.C. §§ 363, 502 And 503 And Fed. R. Bankr. P. 9019(b) Authorizing Debtors To Compromise Or Settle Certain Classes Of Controversy And Allow Claims Without Further Court Approval (Docket No. 8401), the Debtors and the Claimant have executed a Joint Stipulation And Agreed Order Compromising And Allowing Proofs Of Claim Numbers 1933, 2708, 2709, 2710, 2711, And 2712 (Liquidity Solutions Inc., As Assignee Of Metal Powder Products Company and EST Testing Solutions) (the "Joint Stipulation").

PLEASE TAKE FURTHER NOTICE that, pursuant to the Joint Stipulation, the Debtors and the Claimant have agreed (i) to allow Claim 1933 as a general unsecured non-priority claim in the amount of \$142,833.34, Claim 2708 as a general unsecured non-priority claim in the amount of \$3,014.55, Claim 2709 as a general unsecured non-priority claim in the amount of \$33,544.10, Claim 2710 as a general unsecured non-priority claim in the amount of \$145,323.07, Claim 2711 as a general unsecured non-priority claim in the amount of \$14,700.00, and Claim 2712 as a general unsecured non-priority claim in the amount of \$23,622.00, and (ii) the Claimant shall withdraw its Responses to the Omnibus Claims Objections with respect to the Claims.

PLEASE TAKE FURTHER NOTICE that if timely written objections are filed, served, and received in accordance with this notice, a hearing to consider approval of the Joint Stipulation will be held on July 23, 2008, at 10:00 a.m. (prevailing Eastern Time) in the United States Bankruptcy Court for the Southern District of New York (the "Bankruptcy Court").

PLEASE TAKE FURTHER NOTICE that if no written objections to the Joint Stipulation are timely filed, served, and received, the Debtors will present the Joint Stipulation for consideration by the Bankruptcy Court on July 1, 2008.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Joint Stipulation must (a) be in writing, (b) conform to the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the Southern District of New York, and the Claims Objection Procedures Order, (c) be filed with the Bankruptcy Court in accordance with General Order M-242 (as amended) – registered users of the Bankruptcy Court's case filing system must file electronically, and all other parties-in-interest must file on a 3.5 inch disk (preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format), (d) be submitted in hard copy form directly to the chambers of the Honorable Robert D. Drain, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, Room 632, New York, New York 10004, and (e) be served upon (i) Delphi Corporation, 5725 Delphi Drive, Troy, Michigan 48098 (Att'n: General Counsel) and (ii) counsel to the Debtors, Skadden, Arps, Slate, Meagher & Flom LLP, 333 West Wacker Drive, Suite 2100, Chicago, Illinois 60606 (Att'n: John Wm. Butler, Jr., John K. Lyons, and Joseph N. Wharton), in each case so as to be received no later than 4:00 p.m. (prevailing Eastern time) on June 30, 2008.

Dated: New York, New York
June 24, 2008

SKADDEN, ARPS, SLATE, MEAGHER &
FLOM LLP

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